

1 Bill Robins III, Esq. (SBN 296101)
2 Robert T. Bryson, Esq. (SBN 156953)
3 Rex Grady, Esq. (SBN 232236)
4 **ROBINS CLOUD LLP**
5 808 Wilshire Blvd., Suite 450
6 Santa Monica, California 90401
7 Telephone: (310) 929-4200
8 Facsimile: (310) 566-5900

9 Attorneys for Creditor, Cynthia Mary Rost

10 Matthew W. Grimshaw, Esq. (SBN 210424)
11 **GRIMSHAW LAW GROUP, P.C.**
12 26 Executive Park, Ste. 250
13 Irvine, California 92614
14 Telephone: (949) 734-0187
15 Facsimile: (208) 391-7860

16 Counsel for Robins Cloud LLP

17 UNITED STATES BANKRUPTCY COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 In re) Case No. 19-30088 (DM)
21 PG&E CORPORATION,)
22 and) Chapter 11
23)
24 PACIFIC GAS AND ELECTRIC) (Lead Case–Jointly Administered)
25 COMPANY)
26 Debtors)
27) **REQUEST FOR RELIEF UPON**
28) **DEFAULT IN SUPPORT OF MOTION**
Affects:) **FOR ORDER AUTHORIZING**
) **WITHDRAWAL OF COUNSEL**
 ☐ PG&E Corporation)
 ☐ Pacific Gas & Electric Company)
 ☒ Both Debtors) [RE: Dkt. Nos. 11326, 11327, 11328, and 11329]
)
 * All papers shall be filed in the Lead)
 Case, No. 19-30088 (DM).)
)

///

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 Under B.L.R. 9014-1(b)(4), Robins Cloud LP (“Firm”) hereby requests that Court enter an
3 order by default on its Motion for Order Authorizing Withdrawal of Counsel to Cynthia Mary Rost
4 (“Creditor”)¹, Dkt. No. 11326 (“Motion”).

5 **RELIEF REQUESTED IN THE MOTION**

6 The Motion seeks an order authorizing the Firm to withdraw as counsel of record to the
7 Creditor.

8 **NOTICE AND SERVICE**

9 A Notice and Opportunity for Hearing on Motion for Order Authorizing Withdraw of
10 Counsel to Cynthia Mary Rost was filed concurrently with the Motion on September 26, 2021, Dkt.
11 No. 11327 (“Notice and Opportunity for Hearing”). The Motion, the supporting declaration of
12 Robert Bryson, Dkt. No. 11328, and the Notice and Opportunity for Hearing were served as
13 described in the Certificate of Service filed on September 26, 2021, Dkt. No. 11329.

14 The deadline to file a response or opposition to the Motion has passed, and no opposition has
15 been filed with the Court or received by the Firm.

16 **DECLARATION OF NO OPPOSITION RECEIVED**

17 The undersigned hereby declares, pursuant to 28 U.S.C. §1746, under penalty of perjury,
18 that:

19 1. I am an individual over 18 years of age and competent to make this Declaration.

20 2. I am the founder of Grimshaw Law Group, P.C., and an attorney at law duly
21 admitted to practice before all courts of the State of California and the United States District Court
22 for the Northern District of California.

23 3. I am counsel for the law firm of Robins Cloud LP (the “Firm”), attorneys of record
24 for Cynthia Mary Rost (“Creditor”).²

25
26 _____
27 ¹ Robins Cloud LLP retained Grimshaw Law Group, P.C. as bankruptcy counsel to, among other
28 things, assist it in filing this motion. Grimshaw Law Group has no contractual or attorney/client
relationship with Creditor. Declaration of Robert Bryson in Support of Motion for Order Authorizing
Withdrawal of Counsel (“Bryson Decl.”), ¶2, fn.1.

² Grimshaw Law Group has no contractual or attorney/client relationship with Creditor.

4. I have reviewed the Court's docket in these Chapter 11 Cases and determined that no response or opposition has been filed with respect to the Motion.

5. A proposed order will be lodged concurrently as provided for in B.L.R. 9014-1(b)(3)(A).

WHEREFORE, the Firm hereby requests that the Court enter the proposed order filed concurrently herewith granting the Motion for the reasons set forth therein.

Executed on October 21, 2021.

GRIMSHAW LAW GROUP, P.C.

/s/ Matthew W. Grimshaw
Matthew W. Grimshaw

Attorneys for Robins Cloud LLP

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2021, I caused the forgoing **REQUEST FOR RELIEF UPON DEFAULT IN SUPPORT OF MOTION FOR ORDER AUTHORIZING WITHDRAWAL OF COUNSEL** to be electronically filed with the Clerk of the Court using the CM/ECF system, which, in turn, caused a notification to be sent to the interested parties, with the exception of Cynthia Mary Rost.

I further certify that, on the same date, I caused the foregoing document to be sent via first-class mail, postage prepaid, to the following interested party:

Cynthia Mary Rost
5704 Susie Lane
Paradise, CA 95969

/s/ Matthew W. Grimshaw
MATTHEW W. GRIMSHAW